

Page	Issue	Comment and suggested change
p.1, Sec 1; p.1, Sec 1.1; p.2, Sec 1.2;	LLBG Trenches 31 & 34 OUG	There has to be some consistency in the use of the term for this unit. In Section 1.1, it is called 31-34-94.
P.1, Sec 1	"Closure will be begin when when DOE has determined that no further waste management activities will take place."	This is not a decision that DOE gets to make. The regulations define when closure will take place in 610(4)(a). The actual implementation of closure can be changed with Ecology's approval.
p.1, Sec 1, 2 <sup>nd</sup> paragraph	"..closed according to current applicable WAC 173-303 regulations, DOE requirements, and best management practices."	:"best management practices" shall not be on this list as it is not a driver for the activities. Ecology expects best management practices to be used though.
p.1, Sec 1, 2 <sup>nd</sup> paragraph	"Closure of this DWMU will be integrated with the overall cleanup activities under the HHFACO.."	This might be correct. But again, this is not the driver for the closure activities. -610 regulations is the driving force for how closure will be performed.
p.2, Sec 1.2.1	MLLW and TSCA waste occurred from Nov 2007 to Jan 2008.	This is not consistent with the information in Table 3-2, item #4.
p.3, Sec 2.1	Editorial	There is a dangling parenthesis after "-745".
p.3, Sec 3.	The bullet list describes the activities that have taken place.	There seems to be one thing missing on the list and it is an activity that is performed all over Hanford. The FS-1 could be surveyed with a GPERS unit. They are often run over an area in a back and forth pattern to search for rad hot spots that might indicate leak or spill. Hot spots can then be sampled for dangerous waste constituents. It is likely to result in better sampling than the present layout.
p.3, Sec 3.1	This section does not have much specific details and more should be added.	For example: "qualified personnel", don't they have to be trained as well, and how? "appropriate PPE", and "appropriate procedural requirements"; what does that mean and who decides what is appropriate?
p.6, table 3-2	There are assigned waste codes U162, U210, U239 for one of the wastes packages, but no analytical methods are listed for these substances in Table 3-3.	
p.9, Table 3-3	What decides the Yes and No criteria in the table for "Retain as Target Analyte"?	The table contains all these constituents that are listed as either RCRA Characterization or Waste Management. But it is not mentioned in this document how the determination is done. As there is no DQO document attached to this closure plan, the criteria needs to be clearly spelled out.

p.12; p. 13 lists	"analysis required"	It says below the list that "in addition, sample records must include the following information:" The list on top of p. 13 contain "analysis required" as well.
p. 15	Did a selected test on some of the action level calculations.	They were all good.
p. 18, Sec 3.6.10	Editorial	There seems to be a dangling sentence. "Address minor changes." Remove sentence.
p. 18, Sec 3.7	Rewrite first sentence.	New text: An independent qualified registered professional engineer will be retained and will evaluate the closure activities to provide certification of the closure as required in WAC 173-303-610(6).
p. 20, Fig 2	Remove fig 2.	I am not sure that Trench 94 should be in this unit. It seems out of place based on the activities.
Attachment B, Summary of sampling design table.	<sup>e</sup> "Including measurement analyses and...."	Remove footnote e. It is not used in the table.
Attachment B, last page, last paragraph.	This paragraph is similar to other same paragraph in other SAPs (183-H West Clearwell) that I have reviewed in the past and some changes would improve the paragraph.	Care should be used in writing this. The first sentence says "compare the site median(mean) value.." The sign test is designed to test differences in median values and not mean values. To compare mean values the Wilcoxon signed-rank test should be used instead, but I think that requires a different sampling design. I also suggest that the following sentence be added as the 2 <sup>nd</sup> sentence: "EPA's ProUCL software will be used to calculate the applicable values for comparison to the action levels for the COPCs."